

# Reasonable Adjustments Arrangements

- Disabled students (UK)
- Students of determination (UAE)

Document Name: Reasonable Adjustments Arrangements

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## 1 Definitions

<b>Disability (UK)</b>	<p>A person is disabled under the Equality Act 2010 if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to carry out normal day-to-day activities.</p> <p><b>What 'substantial' and 'long-term' mean:</b></p> <ul style="list-style-type: none"><li>• 'substantial' means the effect is more than minor or trivial, for example it takes much longer than it usually would to complete a daily task like getting dressed</li><li>• 'long-term' means it has lasted or is likely to last 12 months or more, for example a breathing condition that develops as a result of a lung infection</li></ul> <p>There are special rules about <u>recurring or fluctuating conditions</u>, for example arthritis.</p> <p><b>Progressive conditions</b></p> <p>A progressive condition is one that gets worse over time. People with progressive conditions can be classed as disabled based on the definition set out above.</p> <p>However, a person automatically meets the disability definition under the Equality Act 2010 from the day they are diagnosed with HIV infection, cancer or multiple sclerosis.</p> <p><b>What is not counted as a disability</b></p> <p>Certain conditions are excluded from the disability definition, for example addiction to non-prescribed drugs or alcohol. There's <u>guidance on conditions that are not covered by the disability definition</u>.</p> <p><b>What is counted as a disability</b></p> <p>Examples of conditions which may constitute disabilities include:</p> <ul style="list-style-type: none"><li>• mental health difficulties e.g. depression, anxiety, post-traumatic stress disorder (PTSD).</li><li>• neurodivergence e.g. dyslexia, autism, attention-deficit hyperactivity disorder (ADHD).</li><li>• physical health conditions e.g. arthritis, diabetes, epilepsy.</li></ul>
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	<ul style="list-style-type: none"> <li>• mobility difficulties e.g. limb differences, spinal cord injury, arthritis.</li> <li>• visual impairments e.g. Irlen's syndrome, cataracts, glaucoma.</li> <li>• hearing impairments e.g. tinnitus, deafness, auditory neuropathy spectrum disorder.</li> </ul> <p>Save for some exceptions, any conditions (including those listed above) will still need to meet the requirements of the disability definition set out above in order to be a disability – i.e. that impairment will need to have a substantial and long-term effect on the individual's ability to carry out day-to-day activities.</p> <p>However, persons with HIV, cancer or multiple sclerosis will always be deemed to be disabled, even if their day-to-day activities are not affected.</p>
<b>Students of Determination (UAE)</b>	<p>In the UAE, 'Students of Determination' is a term used to describe students with disabilities, special educational needs, or other learning challenges. The term reflects the UAE's commitment to inclusion and empowerment, emphasizing the students' strengths and potential rather than focusing on their limitations.</p> <p>This inclusive approach aligns with the <a href="#">UAE's National Policy for Empowering People of Determination</a>, which aims to provide equal opportunities in education and ensure accessibility, individualized support, and integration into mainstream settings whenever possible. These efforts include creating inclusive school environments, specialised training for educators, and personalised learning plans to help students of determination succeed academically and socially.</p>
<b>Neurodiversity and Neurodivergence</b>	<p>Neurodiversity is the concept that all of us vary in the way our brains work. We all process information in different ways, highlighting that there is no right way of thinking or learning. Some people consider themselves to be neurodivergent. They process information and may present or communicate differently to what society would consider to be 'typical'.</p> <p>Some examples of neurodivergence are: autism, attention deficit hyperactivity disorder (ADHD), dyslexia, dyspraxia, dyscalculia, mental health difficulties.</p> <p>Whether a neurodiverse individual is disabled for the purposes of the Equality Act 2010 will depend on whether their condition meets the disability definition as set out above.</p>

<b>Legal Frameworks</b>	<p><a href="#">Equality Act 2010</a></p> <p><a href="#">UAE National Policy for Empowering People of Determination</a></p> <p><a href="#">Advice note for the higher education sector from the legal case of University of Bristol vs Abrahart provided by the UK Equality and Human Rights Commission.</a></p> <p><a href="#">Technical Guidance on further and higher education</a></p>
<b>Reasonable Adjustments</b>	<p>The School's duty to make reasonable adjustments is set out below. In summary, the School is under a duty to take such steps as are reasonable to avoid students with disabilities being disadvantaged.</p> <p>This duty is anticipatory, meaning that providers should consider the needs of disabled students and have accessibility structures in place before a student declares a disability, rather than waiting for them to experience difficulties.</p> <p>An inclusive learning environment may remove the need for individual adjustments to be put in place.</p>
<b>Responsive Adjustments</b>	<p>Responsive adjustments are additional adjustments which students can request when required to accommodate changes to their condition.</p>
<b>Retrospective Adjustments</b>	<p>On rare occasions, it may be necessary to make Retrospective Adjustments after the deadline for an assessment has passed if a student's condition is known to have changed prior to completing an assessment.</p>

## 2 The School's legal obligations

The duty to make reasonable adjustments is made up of three requirements:

- i. Where a provision, criterion or practice puts disabled students at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- ii. Where a physical feature puts disabled students at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage, or adopt a reasonable alternative method of providing the service or exercising the function.
- iii. Where not providing an auxiliary aid or service puts disabled students at a substantial disadvantage compared with students who are not disabled, to take reasonable steps to provide that auxiliary aid/service.

The duty applies to the School in the following contexts:

- i. Deciding who is offered admission as a student;
- ii. The provision of education;
- iii. Access to a benefit, service or facility;
- iv. Deciding on whom a qualification is conferred; and
- v. A qualification that the School confers.

Only **reasonable** adjustments must be made. For example, if an adjustment is highly impractical, prohibitively expensive or an adjustment to a competence standard, it does not have to be made. It is for the School to determine what is reasonable.

Under the **Equality Act 2010**, while universities are legally required to make reasonable adjustments for disabled students, these adjustments do not apply to competence standards.

### **What is meant by Competence Standards?**

Competence standards are defined in the Equality Act as an academic, medical, or other standard applied for the purpose of determining whether or not a person has a particular level of competence or ability. In the School's context, it generally applies to the academic standards that define the essential skills, knowledge, and understanding required to demonstrate a particular level of a relevant competence or ability such as a requirement that a person has a particular level of relevant knowledge of a subject. In the majority of academic environments (apart from dentistry, medicine etc.) modes of assessment will generally not be competence standards.

### **What is meant by reasonable adjustments?**

Reasonable adjustments are modifications or support provided to ensure that students with disabilities are not disadvantaged. The goal is to 'level the playing field' and fosters equitable opportunities for all students.

Decisions to implement adjustments for disabled students should be made as soon as reasonably possible. In many cases, it will be helpful to have further information or guidance from the student, or medical evidence or expert advice in order to determine what reasonable adjustments should be made. However, reasonable adjustments can be put in place without medical evidence and expert advice, and students should not be required to submit further information or evidence in support of their case where the School is aware of or can deduce from the student themselves (for example, through their behaviour or language) the nature of the student's disability, and can determine which adjustments it can reasonably make to assist them; nor should students be put through unnecessary procedural steps.

In deciding whether a particular adjustment is 'reasonable', the School will take various factors into account, including:

- whether taking any particular steps would be effective in overcoming the particular substantive disadvantage faced by the disabled student;
- the extent to which it is practicable to take such steps;
- the type of education or other benefit, facility or service being provided;
- the effect of the disability on the individual;
- the financial and other costs of making the adjustment;
- the availability of grants, loans and other assistance to disabled students;
- the extent to which aids and services will otherwise be provided to students;
- the School's resources;
- health and safety requirements;
- the validity and reliability of the assessment and grading processes; and
- the relevant interests of other people, including other students.

The adjustments the School might consider providing include those listed below. Student Wellbeing Services will maintain and update a log of such appropriate measures that have historically been put into place. To facilitate awareness and preparation, Student Wellbeing Services will share the anonymised update log at the start of each term.

<b>Wellbeing and Mental Health</b>	
Mental health support	<ul style="list-style-type: none"> <li>• Provide access to on-campus counselling or wellbeing services.</li> </ul>
<b>Teaching and Learning</b>	
Accessible materials	<ul style="list-style-type: none"> <li>• Provide lecture slides, handouts, and reading lists in accessible formats (e.g., large print, digital formats), in advance (where possible).</li> <li>• Ensure compatibility with assistive technologies like screen readers.</li> </ul>
Flexible teaching materials	<ul style="list-style-type: none"> <li>• Offer recordings or transcripts of lectures.</li> <li>• Use captions and transcripts for video or audio materials.</li> <li>• Allow participation in virtual or hybrid formats where appropriate.</li> </ul>
<b>Examinations and assessments</b>	
Extra time	<ul style="list-style-type: none"> <li>• Additional time during exams or assignments.</li> <li>• Offer alternate deadlines to accommodate health conditions or energy levels.</li> </ul>
Alternative examination arrangements	<ul style="list-style-type: none"> <li>• Provide rest breaks or allow exams to be taken in a smaller, quieter venue.</li> <li>• Permit use of assistive technology (e.g., speech-to-text software).</li> <li>• Permit use of a school-approved laptop in in-person exams.</li> </ul>
Alternative assessment methods	<ul style="list-style-type: none"> <li>• Modify coursework formats (e.g., oral presentations instead of written essays).</li> <li>• Provide alternatives for practical components if the original task is inaccessible.</li> </ul>

Physical environment	
Accessible facilities	<ul style="list-style-type: none"> <li>• Ensure step-free access, elevators, and accessible toilets.</li> <li>• Provide ergonomic furniture or specialized equipment.</li> </ul>
Adjustments to campus layout	<ul style="list-style-type: none"> <li>• Allocate nearby parking spaces or arrange transport support.</li> <li>• Modify room locations to be more accessible.</li> </ul>
Quiet spaces	<ul style="list-style-type: none"> <li>• Create sensory-friendly or low-stimulation areas for neurodivergent students or those with anxiety.</li> </ul>
Support services	
One-to-one support	<ul style="list-style-type: none"> <li>• Specialist mentors for students with mental health or neurodivergent conditions.</li> <li>• Note-takers or scribes for lectures.</li> </ul>
Assistive technology and software	<ul style="list-style-type: none"> <li>• Provide software like text-to-speech tools, mind-mapping programs, or voice recognition systems.</li> <li>• Loan laptops or other required devices.</li> </ul>
Academic support	<ul style="list-style-type: none"> <li>• Arrange academic support workers, when necessary, e.g. note-takers.</li> </ul>

## 2.1 Reasonable Adjustments process

Students with disabilities requiring reasonable adjustments are encouraged to share their disability as an 'Admit' or as soon as possible after the start of their programme, submitting to the Student Wellbeing Services evidence of their condition where possible (see section on **Evidence**).

Once the student has shared that they have a disability as well as any documentation they may have (see section on **Evidence**), Student Wellbeing Services will contact them to discuss their individual requirements and to create an individual support plan of appropriate measures called a **Summary of Reasonable Adjustments** (SoRA). The **Alternative Assessments Panel** (see section 6.1) should be consulted when relevant.

The SoRA should set out in detail the adjustments being requested, which may be supported by medical or other specialist evidence if it confirms the nature of the disability and its likely impact on a student's capacity to undertake all or parts of a course. Formal diagnoses or medical evidence are useful but are not always a requirement for reasonable adjustments to be put in place. The student's own language and behaviours can be considered as evidence, where relevant (refer to **section 2.2: Evidence**).

Students may contact Student Wellbeing Services at any time to request or to review their reasonable adjustments. The SoRA can be reviewed and amended at any point during their programme if their situation changes (refer to **section 7: Responsive Adjustments**).

The student's need for Reasonable Adjustments will be shared with members of the school that are relevant to put these in place, including the faculty, Programme and Assessment Teams. The student can decide whether the SoRA is shared with other members of staff, such as Career Centre.

It should be noted that some reasonable adjustments take time to implement so whilst the School will make every effort to put adjustments in place as soon as possible, early disclosure is encouraged. For example, requests to sit exams in individual rooms may need to be submitted at least six weeks before the exam date.

## **2.2 Evidence**

The School is required to put reasonable adjustments in place where it has knowledge (which includes constructive knowledge) of a disability and its effect. The School has constructive knowledge of a disability if it is apparent from the student themselves, e.g. through their behaviour or language. Depending on the circumstances, advice from a medical professional can help the School understand what reasonable adjustments may be offered. The School will ask for supporting evidence where this is necessary to enable the School to understand the student's disability and the effect it is having on them, or to assist its understanding of what reasonable adjustments should be offered. Where medical evidence is not provided, the School will still endeavour to make reasonable adjustments based on the information available to it.

Where students are sharing that they have a disability, Student Wellbeing Services will consider the following in assessing what adjustments are needed:

- what the student shares about their experience (key symptoms or impacts) and how this will or is likely to impact their studies
- staff observations and professional judgement
- any medical evidence, if available.

Students are encouraged to share details of their disability early and to engage with the School's questions about their requirements for reasonable adjustments, as this is very helpful in assisting the School to make appropriate adjustments in a timely fashion.

Staff with serious concerns about a student's mental health should refer to **section 5: Safeguarding**.

## **2.2.1 For medical conditions and mental health difficulties**

Where medical evidence is provided, and it is not in English, it will need to be accompanied by a certified translation.

Medical evidence is most helpful when it includes:

- date of diagnosis (if applicable)
- expected duration of the condition or impairment
- key symptoms or impacts relevant to learning (e.g. fatigue, concentration difficulties, mobility issues)

If a student is requesting to return from a period of interruption, it may also be helpful for the practitioner to comment on:

- likelihood of relapse
- ongoing support needs or care arrangements
- the student's support network.

## **2.2.2 Evidence to Access Funded Support**

To access funded support (Disabled Student Allowance) for a Specific Learning Difficulty (SpLD), eligible students are usually required to provide an assessment report from:

- a qualified psychologist, or
- a specialist assessor with a current PATOSS registration.

## **3 Confidentiality**

The sharing of sensitive information is on a need-to-know basis to facilitate support of reasonable adjustments. While we will generally only share such information with the individual's knowledge and consent, there may be situations where we are required or need to do so other than with consent, in accordance with our legal rights and obligations – particularly where there are immediate concerns that the individual's or others' safety is at risk (for students, refer to the *Student Cause for Concern & Safeguarding Protocol and Suicide Safer Strategy*).

The School will process personal information in accordance with its Data Protection Policy [and applicable Privacy Notice] and its obligations under data protection law.

The Student Wellbeing Services Confidentiality Agreement can be accessed [here](#).

## **4 Responsibilities**

All School employees have a responsibility to ensure reasonable adjustments are put in place once a student has shared that they have a disability with them. Staff will refer the student to the specialist Student Wellbeing Service ([wellbeing@london.edu](mailto:wellbeing@london.edu)) which

includes Disability Services outlining their observations and any concerns to support decision-making with reasonable adjustments.

Where School employees are concerned that a student is struggling or failing to engage with their programme, they should take steps to determine whether a student may have a disability and, if so, whether there may be a need to put reasonable adjustments in place. Such steps will include consideration of what the student says about their health condition, how they present when speaking to employees and peers, and their behaviour, for example, attendance at lectures, submission of work, general engagement with courses and club activities.

Once a student has shared that they have a disability and they have been referred to Student Wellbeing Services, Student Wellbeing Services is responsible for recording and coordinating reasonable adjustments, in consultation with other employees. Staff in the Programme Teams, faculty, Subject Areas and Assessment Teams are responsible for implementing reasonable adjustments.

It should be noted however that not all students will want to engage with Student Wellbeing Services, but they may decide to share their disability with other professional services staff or faculty. In these cases, it may not always be possible to implement reasonable adjustments, whilst protecting the confidentiality of the student. Staff and faculty are advised to seek specialist guidance from Student Wellbeing Services, which they can do without disclosing the student's identity.

The School is responsible for ensuring all relevant employees receive training so that they are aware of their responsibilities, are confident in identifying students who may be struggling and know how to refer them to specialist support services.

## **5 Safeguarding**

If any member of the community is concerned about a student's mental health, they should speak to the relevant Programme Director (Lead Safeguarding Officer) or Student Wellbeing Services directly. The School has a separate [Student Cause for Concern and Safeguarding Protocol](#), which staff are strongly encouraged to familiarise themselves with.

## **6 Alternative Assessments**

In situations where reasonable adjustments include changes to the method and/or format of assessment itself, such reasonable adjustments must first be approved by an Alternative Assessments Panel.

It is anticipated that the need for alternative assessments will be part of the discussion when the SoRA is drafted with Student Wellbeing Services at the start of the programme.

However, there will be times, if disability-related needs are evolving, that a student's needs require revisions to the SoRA during the programme and this could include the need for alternative assessments.

## **6.1 Alternative Assessments Panel**

Adjustments which require significant changes to the School's examinations and assessment will need to be approved by an Alternative Assessments Panel, who will assess whether such adjustments would be 'reasonable'. The Panel has delegated authority from the Academic Policy Committee to review the adjustments proposed by Student Wellbeing Services and to implement appropriate measures if they are reasonable adjustments.

Membership of the Panel may include the relevant members among:

- Programme Directors
- Academic Directors
- Student Wellbeing Services
- Quality and Academic Standards

The panel will meet as required. The final decision rests with the Academic Director, in consultation with the panel.

## **6.2 Alternative Assessments Process**

Requests, on behalf of the student, will be presented to the Alternative Assessments Panel by Student Wellbeing Services, as early as possible. Ideally, this will be 6 weeks prior to an assessment, although more likely these arrangements will be agreed at the start of the academic year so that appropriate measures can be put in place for the rest of the year.

The request for an alternative assessment will be recorded in the SoRA by Student Wellbeing Services in consultation with the student. The Alternative Assessments Panel will evaluate the reasonableness of any requested adjustments to the method or format of assessment, particularly their necessity and effectiveness. The requirement when considering alternative assessments is to identify what would be fair and reasonable for the student and their individual circumstances, while maintaining the academic and competence standards of the course. To facilitate consistent support, the panel will consult the updated log of appropriate measures.

The final decision rests with the Alternative Assessments Panel. The relevant Programme Team will inform the student of the outcome.

The student can appeal the decision reached by the panel, in line with the existing appeal processes (see **Academic Appeal Policy**).

## 7 Responsive Adjustments

### 7.1 What is a responsive adjustment?

Students with disabilities may experience changes to an existing condition that requires the School to put in place additional adjustments to those outlined in their SoRA (where a SoRA is in place).

Examples of responsive adjustment requests may include:

- Extensions to coursework deadlines, including take-home assignments, problem sets, if reasonable.
- To take an assessment at the next opportunity, uncapped.
- To drop an elective.

If the request is for an extension to the deadline for coursework or removal of late submission penalties, it will be necessary to consult with faculty. If it requires any changes to the assessment, please follow the process for deciding **alternative assessments** outlined in **section 6**.

### 7.2 How can a student request a responsive adjustment?

Requests for responsive adjustments must be made **as early as possible** and before the exam or assessment deadline. If the assessment deadline (or the student's deadline) has passed, and the request is related to changes in the student's disability, they should speak to the Student Wellbeing Services who will provide guidance. The student should email their request to [wellbeing@london.edu](mailto:wellbeing@london.edu) and copy in their programme or stream manager.

Requests for responsive adjustments are assessed on a case-by-case basis. In some cases, the School may need to request medical evidence.

### 7.3 Further information when considering responsive adjustments

#### 7.3.1 Timed exams

Where students are not registered with Student Wellbeing Services, and time is of the essence, the member of staff who is in contact with the student will liaise with the Programme Director to request that the student(s) be permitted to miss the exam sitting and take the exam at the next available opportunity as a first attempt, uncapped. The Programme Team will refer the student to Student Wellbeing Services.

Where the situation arises immediately before or during a timed exam, staff may advise the student not to take the exam and refer the matter to their Programme Team and Student Wellbeing Services.

### **7.3.2 Extensions to coursework/ take-home assignments**

Students may sometimes require additional time to complete their coursework/ take-home assignments, due to a flare-up of their disability or to remove barriers that particular modes of assessment may present in relation to their disability. They should be advised to reach out to Student Wellbeing Services at least three working days before the deadline, to request an extension. Extensions of up to 96 hours will be considered and, where appropriate, approved by Student Wellbeing Services and always in collaboration with the course instructor.

### **7.3.3 Elective drop**

A student may be permitted to drop an elective (when all other options have been exhausted), based on the student's presentation, as observed by any member of staff, as well as any evidence provided.

The request to drop the elective will be considered before the date/ deadline of the final assessment. If it is considered that the student has a severe/ urgent condition, staff will email the Programme Director to recommend allowing the student to drop the elective. The Programme Director will notify the Director, Central Services of the decision.

If the student has engaged with the elective and submitted coursework/assessments, the Programme Director will need to consult with the Academic Director before granting approval for the request.

### **7.3.4 Global Experiences course drop**

The Academic Regulations provide that the add/drop deadlines for Global Experiences is approximately 3 months in advance of it commencing and students withdrawing after the deadline, for any reason, may be liable for any costs incurred. The majority of students seeking to drop a Global Experience after the deadline will need to go via the Extenuating Circumstances Policy route; however, where there are significant safeguarding concerns or where a student is facing complex circumstances related to their mental health, disability or wellbeing that may interfere with their ability to engage with the Global Experience, Student Wellbeing Services will contact the relevant Programme Director. The Programme Director will advise on the most appropriate course of action.

### **7.3.5 Retrospective Adjustments**

Retrospective adjustments are reasonable adjustments for students where a disability has been diagnosed or shared after assessments and grading have been completed; and/or there has been an impact to already completed assessed components for a disabled student due to their condition or to changes to their condition. Retrospective

adjustments will only be made in exceptional cases, and wherever possible students are expected to liaise with Student Wellbeing Services prior to assessments taking place.

Decisions about retrospective adjustments will be made by the **Alternative Assessments Panel**.